

CRAIG A. MUELLER, ESQ.
Nevada Bar No. 4703
MUELLER & ASSOCIATES, INC.
723 S. 7th Street
Las Vegas, NV 89101
Telephone: (702) 382-1200
Facsimile: (702) 637-4817
Email: electronicservice@craigmuellerrlaw.com
Attorney for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LARRY G. PHILPOT,
Plaintiff,

vs.

CITIZEN OUTREACH FOUNDATION,
INC.
Defendant.

Case No.: 2:20-cv-00824

STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND THE TIME
WITHIN WHICH DEFENDANT MAY
REPLY TO PLAINTIFF'S RESPONSE
TO DEFENDANT'S MOTION TO
DISMISS

(FIRST REQUEST)

Defendant, CITIZEN OUTREACH FOUNDATION, INC. ("Defendant") and Plaintiff LARRY G. PHILPOT ("Plaintiff"), by and through their respective counsel, hereby stipulate and agree pursuant to Local Rule 7-1 as follows:

1. Whereas, on May 7, 2020, Plaintiff filed a Complaint; Jury Trial Demand before the United States District Court, District of Nevada, designated Case No.: 2:20-cv-00824-JAD-EJY. ECF No. 1.

2. Whereas, on May 20, 2020, Plaintiff served a copy of the Summons and Complaint on Defendant CITIZEN OUTREACH FOUNDATION, INC. by Rule 4 Waiver of Service of Summons, signed by Craig A. Mueller, Esq.

3. Whereas, Defendant response to Plaintiff's Complaint is due July 20, 2020. Fed R. Civ. P. 12 (a).

4. Whereas, on June 12, 2020, Defendant filed a Motion to Dismiss, with a

responsive deadline of June 26, 2020. ECF No. 8.

5. Whereas, on June 26, 2020, Plaintiff filed a Response to Defendant's Motion to Dismiss, with an opposition deadline of July 3, 2020. ECF No. 10

6. Whereas, Defendant requested additional time to file their opposition due to Craig A. Mueller being out of town till July 6, 2020; therefore, the parties agree to a one (1) week extension of time through July 10, 2020, for Defendants to respond to Plaintiff's Response to Defendant's Motion to Dismiss.

7. Whereas, this is the first request for an extension regarding the filing of Defendant's Opposition to Plaintiff's Response to Defendant's Motion to Dismiss, which is made in good faith, not for the purposes of delay, and neither party is prejudiced by the short extension.

DATED this 1st day of July 2020.

DATED this 1st day of July 2020

MUELLER & ASSOCIATES, INC.

HUTCHINSON & STEFFEN, PLLC.

/s/ Craig A. Mueller

/s/ Alex R. Velto

CRAIG A. MUELLER, ESQ.
Nevada Bar No. 4703
723 S. 7th Street
Las Vegas, Nevada 89101
Attorney for Defendant

ALEX R. VELTO, ESQ.
Nevada Bar No. 14961
500 Damonte Ranch Parkway, Suite 980
Reno, Nevada 89521
Attorney for Plaintiff

ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: July 2, 2020

MUELLER & ASSOCIATES, INC.
723 S. 7th Street, Las Vegas, Nevada 89101
Telephone: (702) 382-1200 Facsimile: (702) 637-4817